

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION	:	12-md-02311
	:	Honorable Marianne O. Battani
	:	
In Re: All Auto Parts Cases	:	2:12-MD-02311-MOB-MKM
	:	
	:	
THIS DOCUMENT RELATES TO: ALL AUTO PARTS CASES	:	Oral Argument Requested
	:	
	:	

**DECLARATION OF ADAM C. HEMLOCK IN SUPPORT OF DEFENDANTS’ REPLY
IN SUPPORT OF THE PARTIES’ MOTION TO COMPEL DISCOVERY FROM NON-
PARTY ORIGINAL EQUIPMENT MANUFACTURERS**

I, ADAM C. HEMLOCK, declare as follows:

1. I am an attorney at Weil, Gotshal & Manges LLP, counsel for Bridgestone Corporation, Bridgestone APM Company, Calsonic Kansei Corporation, and Calsonic Kansei North America, Inc. in the above-entitled action. I make this Declaration pursuant to 28 U.S.C. § 1746 to place before the Court true and correct copies of the following exhibits in support of the Defendants' Reply in Support of the Parties' Motion to Compel Discovery from Non-Party Original Equipment Manufacturers:

Exhibit

1. Declaration of Dr. Edward A. Snyder (filed under seal).
2. Complaint, *Bedford Nissan, Inc., et al. v. Nissan North America, Inc.*, No. 16-cv-00423 (N.D. Ohio), filed Feb. 23, 2016.
3. Relevant Excerpts of Transcript of Deposition of Non-Party Auto Dealer Granite Imports (filed under seal).
4. Relevant Excerpts of Transcript of Deposition of Non-Party Auto Dealer Bird Chevy (filed under seal).
5. Feb. 4, 2016 Letter from Ronnie Spiegel, on behalf of Serving Parties, to Susan R. Peck, Counsel for Hyundai and Kia Entities.
6. Feb. 4, 2016 Letter from Mike Shaper, Counsel for Toyota Entities, to Ronnie Spiegel, on behalf of the Serving Parties.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 11th day of March, 2016.

/s/ Adam C. Hemlock
Adam C. Hemlock

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2016, I caused the foregoing Declaration of Adam C. Hemlock in Support of the Defendants' Reply in Support of the Parties' Motion to Compel Discovery From Non-Party Original Equipment Manufacturers to be served on the non-parties via FedEx. The foregoing materials were also electronically filed with the Clerk of the Court using the CM/ECF system, which will send notifications of such filings to the Parties' counsel of record.

Dated: March 11, 2016

/s/ Cameron M. Bonk
Cameron M. Bonk
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